

REMARKS

Reconsideration of this application, in view of the foregoing amendments and the following remarks, is respectfully requested.

Claim Rejections - 35 USC § 103

Claims 8-9, 16, 1-2, 6 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kurdzo et al. (U.S. Patent No. 6,088,365) in view of Hwang (U.S. 2002/0080821). Applicants respectfully traverse these rejections.

There are three basic criteria to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a). First, there must be some suggestion or motivation in the cited references to modify or combine their teachings; second, there must be reasonable expectation of success; and third, the prior art references must teach or suggest all the claim limitations. *See* M.P.E.P §2142. As to claims 1 and 8, the combination of cited references does not teach or suggest all the claim limitations.

Regarding claims 1 and 8, the Examiner has cited cell FIFO (first-in-first-out) buffers as DMA units recited in claims 1 and 8. Applicants respectfully point to the Examiner that as known and understood in the art, DMA units are distinct units as compared to buffers such as FIFO. cell FIFOs as described by Kurdzo are buffers configured to store data for corresponding processing units. The DMA units as recited in claims 1 and 8 are configured to fetch corresponding packets from processors. Claims 1 and 8 are amended to further clarify this aspect. On one hand, the Examiner has cited CELL-FIFO as DMA units recited in claims 1 and 8 and on other hand the Examiner has cited the very same CELL FIFO as buffer associated with each processor as recited in claims 6 and 12. Applicants respectfully point to the Examiner that claims 1, 8, 6, and 12 recite distinct elements such as first and second DSP units and buffer associated with each processor. The prior art references must teach or suggest all the claim limitations; however, the Examiner has not cited any section in cited references that teaches these distinct elements.


In fact, the Examiner has rejected claims 12 by stating that "In the claims 4, 11, 12, Kurdzo et al. discloses a plurality of entries in router identifiers table identifiers a particular transmit channel for multiplexing a plurality of physical phone line onto one ATM channel (see figure 2, col.4, lines 39-41, lines 50-57)." (Emphasis added). Applicants respectfully point to the Examiner that actually in a complete contrast, claim 12 recites that the first direct memory access unit is further operably configured to fetch said voice packet from a voice buffer associated with each digital signal processor in said DSP sub-system, which is completely different than what the Examiner has cited. Applicants respectfully request a careful review and Examination of these claims and as the Examiner has not cited any reference teaching every limitation of claims 1 and 8, these claims and those depend therefrom are patentably distinguishable from the combination of cited references.

As to claim 16, the Examiner has simply repeated the rejection of apparatus claims 1 and 8. Applicants respectfully point to the Examiner that claim 16 is a method claim and recites distinct method steps which has nothing to do with the structure recited by the Examiner by repeating the rejection of claims 1 and 8. For example, in rejecting claim 16, the Examiner has cited a first and second DMA unit; however, claim 16 does not even recite DMA unit. For functionality aspect of structure elements, Kurdzo does not even discuss the functionality of the cited elements CELL FIFO in comparison with recited steps in claim 16. Applicants respectfully request a careful review and Examination of these claims and in alternative request an allowance of these claims.

Applicant believes this application and the claims herein to be in a condition for allowance. Should the Examiner have further inquiry concerning these matters, please contact the below named attorney for Applicant.

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Respectfully submitted,


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